

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

A.F., on behalf of J.F., and A.R., on behalf of
B.R.,

Plaintiff,

v.

CHARACTER TECHNOLOGIES, INC.;
NOAM SHAZEER; DANIEL DE FREITAS
ADIWARSANA; GOOGLE LLC;
ALPHABET INC.,

Defendants.

Civil No. 2:24-cv-01014-JRG-RSP

**UNOPPOSED MOTION FOR EXTENSION OF TIME
FOR PLAINTIFFS TO FILE OPPOSITION TO PENDING MOTIONS**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Plaintiffs A.F., on behalf of J.F., and A.R., on behalf of B.R. (“Plaintiffs”), hereby moves for an extension of time to respond to: (1) Defendant Character Technologies, Inc.’s (“C.AI”) Motion to Compel Arbitration and to Stay Proceedings Pending Arbitration (**Dkt No. 34**); (2) Defendant Noam Shazeer’s Motion to Dismiss the Complaint for Lack of Personal Jurisdiction (**Dkt No. 38**); (3) Joint Opposed Motion of Defendants Character Technologies, Inc.’s, Noam Shazeer, Daniel De Freitas Adiwarsana, Google LLC, and Alphabet Inc. to Stay Discovery Pending Motions to Compel Arbitration (**Dkt. No. 39**); and (4) Defendants Google LLC’s, Alphabet Inc.’s, Noam Shazeer’s and Daniel De Freitas’s Motion to Compel Arbitration and to Stay Proceedings Pending Arbitration (**Dkt No. 42**).

Plaintiffs’ opposition to the pending motions are currently due on March 24, 2025. Hearing on the pending motions are currently set for April 23, 2025, at 9:00 a.m. before the Hon. Magistrate Judge Roy S. Payne.

On March 13, 2025, counsel for Plaintiffs communicated with Defendants counsel

requesting additional time to respond to the pending motions due to counsel's conflict in schedule with other deadlines and depositions in other pending matters. Defendants graciously agreed to grant Plaintiffs an extension to respond to Defendants pending motions, provided that the hearing shall remain set for April 23, 2025.

Plaintiffs therefore seek a one-week extension to March 31, 2025 to file their responses to the pending motions and do not seek to continue the hearing. Plaintiffs ask that the hearing remain set for April 23, 2025, at 9:00 a.m. before the Hon. Magistrate Judge Roy S. Payne.

DATED: March 21, 2025.

SOCIAL MEDIA VICTIMS LAW CENTER PLLC

By: /s/ Matthew P. Bergman

Matthew P. Bergman

Pro Hac Vice

Matthew Bergman

matt@socialmediavictims.org

Laura Marquez-Garrett

laura@socialmediavictims.org

Glenn Draper

glenn@socialmediavictims.org

600 1st Avenue, Suite 102-PMB 2383

Seattle, WA 98104

Telephone: (206) 741-4862

TECH JUSTICE LAW PROJECT

Meetali Jain

meetali@techjusticelaw.org

611 Pennsylvania Avenue Southeast #337

Washington, DC 20003

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2025, I electronically submitted the foregoing document with the clerk of the United States District Court for the Eastern District of Texas, using the Court's CM/ECF system, which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ Matthew P. Bergman

Matthew P. Bergman

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), I hereby certify that on March 13, 2025, counsel for Plaintiffs communicated with Defendants counsel requesting an extension of time and on March 14, 2025, counsel for Defendants responded regarding the issues in this motion, in accordance with the requirements of Local Rule CV-7(h). The parties reached an agreement and Defendants do not oppose this motion.

/s/ Matthew P. Bergman

Matthew P. Bergman